



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javitz Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

January 15, 2025

**BY ECF**

The Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Rafat Amirov and Polad Omarov, S8 22 Cr. 438 (CM)**

Dear Judge McMahon:

The Government respectfully writes in advance of the conference scheduled for January 16, 2025 at 2:00 p.m. The parties have consulted and jointly propose the following schedule for pre-trial filings, in connection with the trial scheduled to begin March 10, 2025:

- expert disclosures due January 24, 2025;
- notice by the defendant(s) pursuant to Section 5 of the Classified Information Procedures Act (“CIPA”), if any, due January 24, 2025;<sup>1</sup>
- opening motions *in limine*, requests to charge, and *voir dire*, due February 7, 2025, with oppositions due February 21, 2025, and replies, if any, due February 26, 2025.

The parties also respectfully request that the Court schedule a final pre-trial conference at a time convenient for the Court the week of March 3, 2025.

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<sup>1</sup> Should either defendant make Section 5 notice, the Government will propose a schedule for possible motion practice pursuant to CIPA Sections 6(a) and 6(c).

